BAKER & HOSTETLER LLP

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Marc E. Hirschfield Nicholas J. Cremona

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

V.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

URI AND MYNA HERSCHER FAMILY TRUST, DATED MAY 27, 1998, URI D. HERSCHER, as trustor, trustee and as an individual, and MYNA M. HERSCHER, as trustor, trustee and as an individual,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04927 (SMB)

FOURTH AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following amended deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures: have been exchanged.
- 2. Fact Discovery shall be completed by: September 18, 2015.
- 3. The Disclosure of Case-in-Chief Experts shall be due: November 17, 2015.
- 4. The Disclosure of Rebuttal Experts shall be due: December 17, 2015.
- 5. The Deadline for Completion of Expert Discovery shall be: March 17, 2016.
- 6. The Deadline to File the Notice of Mediation Referral shall be: May 17, 2016.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: May 31, 2016.
- 8. The Deadline for Conclusion of Mediation shall be: September 30, 2016.

Dated: New York, New York May 21, 2015

Of Counsel:

BAKER & HOSTETLER LLP

11601 Wilshire Boulevard, Suite 1400 Los Angeles, California 90025-0509

Telephone: 310.820.8800 Facsimile: 310.820.8859 Michael R. Matthias

Email: mmatthias@bakerlaw.com

Teresa C. Chow

Email: tchow@bakerlaw.com

BAKER & HOSTETLER LLP

By: <u>s/Nicholas J. Cremona</u>

David J. Sheehan Marc E. Hirschfield Nicholas J. Cremona 45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4200 Facsimile: (212) 589-4201

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff